

FERC 101

Tips on Using the FERC Web Site

Caveats

I am very much a FERC newbie, but I wanted to pass along a few pointers based on my recent use of the www.ferc.gov website.

Website Weirdness

The FERC web site can be quite frustrating to use at times. For example, it was either offline or locked up all of the many times that I tried it on a recent weekend. And when it is “working”, it can be even more frustrating.

It is not uncommon to have web pages at the site fail to load, even after you have successfully logged in.

When you are entering comments, you work in a text box that allows a maximum of 6,000 characters – some two pages of text. If you compose your comments in this box, it can take quite some time. In my experience, the longer you spend on this page before clicking the submit button, the greater the chance that you will be told that there was an error and to please try again in 10 minutes. And of course, your text is lost at that point.

When you comment to FERC, I strongly suggest that you craft your text message in a separate text editor ahead of time, copy it and then log on to ferc.gov and paste your text into the comment box, verify that it is complete and press submit. Also note that depending upon the editor you chose, you may need to enter additional carriage returns into your text after you have pasted it to properly format your message.

Getting Started

Go to www.ferc.gov. Scroll down and on the left-hand side of the page and click on FERC Online. The first time in, I suggest you register (see below). After that initial registration, you can simply log in. After logging in, you can use eLibrary, eSubscription, eComment and eFiling – as explained below.

Registering

It is not required that you register on ferc.gov in order to be able to use eComment, but I suggest that you do it because it gives you access to additional services like eLibrary, eSubscription and eFiling. Also, once you are registered, you can log on using your email address and your password and your personal information fields will then be automatically filled in, saving you time if you intend to use www.ferc.gov multiple times.

But there is a registration anomaly on the site. To register, you fill in information on multiple pages. A couple of pages in, you are asked to enter information for an alternate contact, with a note that this is optional if you are not registering as a member of an organization. When I clicked submit, I got an error saying these are required fields, despite the fact that I had not declared an organization. I then entered my own information in the alternate contact fields and I was good to go. The site then sent me a verification email with a link that I clicked to complete my registration.

Using eLibrary

By searching for docket PF14-22, you can view both the original pre-filing documents from Kinder Morgan and all comments made to date.

Using eSubscription

I decided to subscribe to docket PF14-22, so that I will receive an email with attached text each time someone submits an eComment for this docket. It looks to be easy to unsubscribe if you wish to. At this point, the volume of comments is surprisingly low.

Using eComment

You use the eComment page to enter your own text comments to FERC. You first specify a docket number (again PF14-22) and then enter your comment in the text box and click Submit. Again, there is a 6,000 character limit per comment. A counter shows you how many more characters you have available as you enter your comment. Please read the suggestion above about using a separate text editor to prepare your comments.

After a successful eComment submission, you will receive an email confirming your comment. And if you have subscribed, you (and all other subscribers) will also receive another email notifying you of your new comment.

You are free to enter multiple comments.

Only text can be submitted through the eComment system, not existing files or graphics. See the next section if you want to include non-text information.

Using eFiling

eFiling can be used to pass files to FERC for a variety of reasons, including making comments that cannot be handled by the eComment system. You will only need to use eFiling if you have a comment greater than 6,000 characters or you have non-text information that you want to communicate with FERC (for instance a map or a photo). In the latter case, I believe that you should combine your text comments and the non-text supporting information in a single document (for instance, a Microsoft Word file) and then upload it using eFiling.

The eFiling system will accept many common file types including:

- PDF (Adobe)
- DOC, DOCX (Microsoft Word)
- XLS, XLSX (Microsoft Excel)

and many, many others including image file types, audio file types, etc. The Upload page has a link that displays a list of acceptable file types.

You should prepare and save your file to be uploaded before you start the eFiling process or else you might get timed out by the FERC system before your eFiling is complete.

The eFiling process requires that you make a number of selections, but it is fairly straightforward. When I eFiled, I made the following entries:

Field	Entry
How is your filing to be directed?	<i>Gas</i>
What kind of filing are you making?	<i>Report / Form for Existing Docket Number</i>
	Click <i>Next</i>
Enter Docket Number	Enter PF14-22, click <i>Search</i> , click + to select the docket
	Click <i>Next</i>
Select File	Click <i>Choose File</i> and double-click the file you want to upload
Description	Enter a description, click <i>Upload</i>
	After the upload completes, click <i>Next</i>
Specify Filing Parties	Click <i>As an Individual</i>
	Click <i>Next</i>
Contact Email	Enter your email address, click <i>Add as Signer</i>
	Click <i>Next</i>
Please modify the description...	Edit the description as you wish
	Click <i>Next</i>
	Double check the information, click <i>Submit</i> , wait for a response

After a successful eFiling submission, you will receive an email confirming your file upload. And if you have subscribed, you (and all other subscribers) will also receive another email notifying you of your new comment.

Intervenor

If and when Kinder Morgan gets a FERC license for this proposed pipeline (KM estimates 9/2015), you can then register as an intervenor on the FERC system. There is no need to register as an Intervenor before then and I am not going to attempt to explain that system at this time.

Summary

Although a sometimes frustrating web site to use, I strongly suggest that anyone with an interest in stopping this pipeline register at www.ferc.gov and have a look around. Browse the library, subscribe and prepare your own text comment and submit it. And encourage others to do so. We need to all get familiar with this site as the battle moves on to FERC – and the sooner you do so, the better.